

# Exhibit A

**Schedule A of Master Eastman Order**  
**Search details**

Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
1. (a)	<p>emails, letters and other documents and communications within the possession custody or power of BSGR that were exchanged between BSGR reps and ArcelorMittal reps and between BSGR Representatives and Chinalco reps, regarding a potential joint venture, partnership, or similar investment in Simandou Blocks 1 and 2, between January 1, 2008 and April 30, 2010.</p> <p>Date period: 1 Jan 2008 – 30 April 2010</p>	<p>BSGR E-mail Domain AND (Arcelor E-mail Domain OR Chinalco E-mail Domain) <b>AND</b> (Simandou OR Guinea* OR Block* OR "Trojan horse" OR "project hill")</p>	<p>Navigant search terms: arcelor* OR Mittal OR Chinalco</p> <p>Navigant search terms: *Chalco* (email address)</p> <p>Navigant search terms: Lakshmi</p>	<p>657 / 261 / 59 / 173  15 / 1 / 1 / 0  3 / 9 / 0 / 0</p>
2. (b)	<p>flight logs and passenger details for BSGR's private aircraft Challenger 601, registration VP-CBS, from 2005 to 2014</p>	<p>"Challenger 601"</p> <p>VP-CBS</p>	<p>No search terms needed</p>	
3. (c)	<p>itineraries, records and receipts retained by BSGR in relation to travel to Guinea by Benjamin Steinmetz, Asher Avidan, Marc Struik, Dag Cramer, Yossie Tchelet, Sandra Merloni-Horemans, Avraham Lev Ran, Frédéric Cilins, Roy Oron, Michael Noy, Ian Cope, Iwan Williams, and Sandra Merloni-Horemans from January 1,</p>	<p>(Ben* OR Steinmetz OR Asher OR Avidan OR Frederic OR Cilins OR Struik OR Marc or Dag OR Cramer OR Yossie Or Tchelet OR Sandra OR Merloni*OR Roy OR Oron OR Michael OR Noy OR Ian OR Cope OR Iwan OR Williams) <b>AND</b> (GUGO OR GUCY OR GUFH OR GUXN OR GUKU OR GUMA OR GUNZ OR CKY OR FAA OR KNN OR KSI OR MCA OR NZE)</p>	<p>Navigant search terms: itinerar* AND Guinea AND Steinmetz OR Avidan OR Struik OR Cramer OR Tchelet OR Merloni-Horemans OR Ran OR Cilins OR Oron OR Noy OR Cope OR Williams</p> <p>(steinmetz OR avidan OR struik OR cramer OR tchelet OR merloni-horemans OR ran OR cilins OR oron OR noy OR cope OR williams) AND ("travel league" OR diesenhaus)</p> <p>Date period: 1/1/2005 – 31/12/2013</p>	<p>796 / 8901 / 708 / 7966</p>

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
		2005 until December 31, 2013.			
4.	(d)	BSGR's "Overview of BSGR's Iron Ore Investment in Guinea" and annexures, which BSGR submitted to the Technical Committee in February 2012	overview /s investment OR "technical committee"  "technical committee" <b>AND</b> February <b>AND</b> 2012	No search terms needed	
5.	(e)	The contract between Pentler Holdings and Ismaila Daou dated 20 February 2006 as referred to by Global Witness in "FBI surveillance implicates diamond billionaire in plan to subvert US fraud probe," dated 9 April 2014, p. 4	Pentler <b>AND</b> Ismail*  (percent OR "per cent") <b>AND</b> ("local partner")	Navigant search terms: Daou	0 / 2 / 4 / 2
6.	(f)	Letter from Aboubacar Bah to BSGR demanding payment under the MOU signed by Aboubacar Bah, Ibrahima Sory Touré, Pentler Holdings, Ltd., dated 20 February 2006	Aboub* <b>AND</b> BSG*	Navigant search terms: Bah	195 / 2172 / 189 / 223
7.	(g)	The letters, emails and attachments sent between Mamadie Touré and Frédéric Cilins exchanging versions of a declaration between 27 April 2012 and 5 May 2012	Toure's e-mail AND Cilins' E-mail  (Mamadie OR Touré OR Toure OR wife) <b>AND</b> (Frédéric OR Fred* OR Cilins)  ("five million" OR *5,000,000 OR *5M) <b>AND</b> (destroy* OR lie* OR jury OR Simandou)	Navigant search terms: Toure AND Cilins Date period: 27/4/2012 – 5/5/2012	0 / 0 / 0 / 67
8.	(h)	The letters, emails and attachments from Michael Noy to Frédéric Cilins with edits to the draft of proposed attestation by Mamadie Touré generated in or around March- April 2013	Noy's E-mail AND Cilins' E-mail  (Michael OR Mike) <b>AND</b> (Frédéric OR Fred*)	Navigant search terms: Noy AND Cilins Date period: 1/3/2013 – 1/5/2013	0 / 13 / 14 / 1

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
9.	(i)(i)	The invoice and the receipt relating to the gift of pharmaceuticals allegedly made to the Henriette Conté Foundation in 2004-2005 by Frédéric Cilins.	(HCF OR foundation OR Henriet* OR Conté OR Conte) <b>AND</b> (gift* OR present* OR thank* OR pharma* OR drug* OR medic*)	Navigant search terms: "Henriette Conte Foundation"; Henriette OR ("conte foundation") OR pharmaceutical Date period: 1/1/2004 – 1/1/2006	2 / 0 / 12 / 0
10.	(i)(ii)	The invoice and the receipt relating to the gift of a diamond-covered gold watch allegedly made to President Conté by Roy Oron, and the document that identifies the source of the diamonds in the watch.	(Roy OR Oron) <b>AND</b> (gift* OR present* OR diamond*OR gold OR President OR Conte OR Conté)	Navigant search terms: watch AND Oron	32 / 53 / 29 / 22
11.	(i)(iii)& (iv)	iii. The invoice and the receipt relating to the gift of a model diamond covered Formula 1 race car allegedly made to the Minister of Mines by Roy Oron, and the document that identifies the source of the diamonds in the model. iv. The invoice and the receipt relating to the gift of model diamond covered Formula 1 race car allegedly made to President Conté by Beny Steinmetz, and the document that identifies the source of the diamonds in the model.		Navigant search terms: "formula 1" AND (Steinmetz OR Oron OR diamond OR model OR car); model AND (Steinmetz OR Oron OR diamond); car AND gift AND (Steinmetz OR Oron OR diamond)	1068 / 173 / 2867 / 1357
12.	(i)(v)	The invoice and the receipt relating to the gift of two Land Cruisers allegedly made to Mamadie Touré by Asher Avidan and Beny Steinmetz as described in Mamadie Touré Decl. ¶	(Cruiser* OR toyota*) <b>AND</b> (Mamadie OR Touré OR Toure OR Asher OR Avidan OR Ben* OR Steinmetz OR gift* OR present*)	Navigant search terms: "Land Cruiser" AND (Toure or Mamadie); "Land Cruiser" Date period: 01/01/2008 – 01/01/2009	83 / 324 / 84 / 117

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		<p>26. "waiting for this decree [Rio have licences revoked and re-issued to BSGR – Aprox July 2008], before it was signed, I also received two Land Cruisers. The Land Cruisers were delivered by Avidan and another man, and Avidan told me that the Land Cruiser came from Steinmetz. The President told me to keep one of the Land Cruisers and offer the other to his children, to be able to use it on vacations."</p>			
13.	(i)(vi)	The invoice and the receipt relating to the gift of a necklace allegedly made to Mamadie Touré by Asher Avidan as described in Mamadie Touré Decl. and the document that identifies the source of the necklace.	((necklace OR chain*) /s (diamond* OR gold)) AND (mamadie OR Touré OR Asher OR Avidan)	Navigant search terms: (chain OR necklace OR diamond OR mamadie OR Toure) AND Avidan; "white gold" OR "seven diamonds" Date period: 1/1/2004 – 1/1/2009	0 / 78 / 25 / 17
14.	(j)(i) – (v)	Cashier's receipt for w/drawl : (i) \$200,000 cash allegedly subsequently placed in a bag delivered by Ibrahima Sory Touré to Mamadie Touré on behalf of BSGR in 2006. (ii) \$1 million in cash delivered by Asher Avidan to Mamadie Touré in the BSGR offices in 2008. (iii) \$5,000 given to Mamadie Touré in an envelope by Asher Avidan and Issiaga Bangoura on behalf of BSGR after the death of Lansana Conté in December 2008.	(*200k OR *200,000 OR "*1 million" OR *1,000,000 OR *1M OR *5,000 OR *5k OR cash OR pay* OR withdr*) AND (Mamadie OR Touré OR Toure or wife OR Asher OR Avidan OR Issiaga OR Bangoura)	Navigant search terms: (pay OR withdraw) AND (mamadie OR wife OR "M Toure" OR Toure) Date period: 1/1/06 – 31/12/2009  Additional consultation with accountants for payment evidence.	34 / 99 / 90 /12074

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
		(iv) \$50,000 delivered by a BSGR Representative sent by A Avidan to Mmd Touré in early 2009. (v) \$1 million in cash allegedly paid by BSGR representatives to Mamadie Touré in 2009.			
15.	(j)(vi) – (x)	Cash receipts / bank statements showing vi. payment to Mahmoud Thiam by B Steinmetz or BSGR about time Thiam sent Rio Tinto a February 29, 2009 letter purporting to officially rescind Rio Tinto's rights to Blocks 1 and 2 vii. payment to Mahmoud Thiam around time Thiam sent Rio May 28, 2009 letter demanding that Rio remove its equipment from Blocks 1 and 2 viii. payment to Thiam around time Thiam sent Rio June 26, 2009 letter chastising Rio Tinto for questioning validity of BSGR's rights to Blocks 1 and 2 ix. payment by BSGR rep to Thiam between mid-May and mid-June 2010 x. payments to Mahmoud Thiam between January 1, 2009 and December 31, 2011.	(cash OR compensate OR reward ) <b>AND</b> (Mahmoud OR Thiam)	Navigant search terms: Thiam OR Mahmoud AND "pay*" OR "withdraw"; Thiam AND (HSBC OR Morgan OR payment); Thiam AND (BSGR Treasury Services OR BSGR TS) Date period: 1/1/2009 - 31/12/2011	69 / 72 / 100 / 20
16.	(k)(i)	The bank account statement reflecting an alleged payment of \$998,000 from Ghassan Boutros' account at Rockel Commercial	<b>BSGR's search term includes an apparent misspelling of "Boutrous"</b> (\$998* OR Boutro* OR Deposit* OR	Navigant search terms: Rockel OR Boutros Additional consultation with accountants for payment evidence.	0 / 0 / 0 / 0

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
		Bank to Mamadie Touré on behalf of BSGR on September 3, 2009.	transfer* OR wire*OR bank OR statement OR pay*) <u>AND</u> (Mamadie OR Touré OR Toure )		
17.	(k)(ii)	The bank account statement reflecting an alleged payment of \$2,000 from Ghassan Boutrous' account at Rockel Commercial Bank to Mamadie Touré on behalf of BSGR on September 3, 2009.	(\$2000 OR \$2,000 OR \$2k OR Boutro*) <u>AND</u> (Mamadie OR Touré OR Toure or wife)	Navigant search terms: Rockel OR Boutros  Additional consultation with accountants for payment evidence.	0 / 0 / 0 / 0
18.	(k)(iii)	The bank account statement and the check receipt reflecting an alleged payment of \$100,000 by check from Michael Noy to Mamadie Touré, dated July 21, 2010, from his Bank of Wachovia account on behalf of BSGR.	(\$100,000 OR \$10,000 OR \$10K OR Noy) <u>AND</u> (Mamadie OR Touré OR Toure)	Navigant search terms: Wachovia Date period: 1/6/2010 – 1/8/2010  Additional consultation with accountants for payment evidence.	0 / 1 / 3 / 0
19.	(k)(iv) - (vii)	The bank account statement reflecting an alleged payment of \$149,970 by wire transfer from account in the name of Lev Ran at Bank Leumi to Mamadie Touré's Wells Fargo account, dated July 21, 2010 & \$99,970 by wire transfer from Lev Ran's Bank Leumi account to Mamadie Touré's Wells Fargo account dated August 5, 2010.	"Lev Ran" OR Leumi  \$149*AND (Mamadie OR Touré OR Toure)	Navigant search terms: Wells Fargo OR Leumi Date period: 1/6/2010 – 31/8/2010  Additional consultation with accountants for payment evidence.	65 / 111 / 400 / 0
20.	(k)(viii) – (xi)	Payments by Olympia title insurance to Mamadie Toure Accounts in 2012	(Mamadie OR Touré OR Toure) <u>AND</u> (pay* OR Olympia OR title OR insurance)	Navigant search terms: "Olympia Title Insurance" OR "Wells Fargo" OR "BGMP" Date period: 1/10/2011 – 31/5/2012  Additional consultation with accountants for payment evidence.	12 / 104 / 21 / 0

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
21.	(k)(xii)	wire transfers and comparable records evidencing payments relating to Simandou made by any BSGR Representative to (a) Frédéric Cilins; (c) Michael Noy; (d) Ibrahima Touré; (e) Mamadie Touré; (f) Moussa Dadis Camara; (g) Lonsana Conté; (h) Pentler Holdings; or (i) Matinda and Co. Limited.	(Frédéric OR Fred* OR Frederic OR Cilins OR Michael OR Noy OR Mike OR Ibrahima OR Toure OR Touré OR Mamadie OR Moussa OR Dadis OR Camara OR Lonsana OR Conte OR Conté OR Pentler OR Matinda OR BSG*) <u>AND</u> (wire* OR transfer* OR pay* OR deposit* OR cash OR gift* OR present)	Consultations with accountants.	
22.	(l)	itineraries, records, and receipts retained by BSGR in relation to travel: i. to Dakar, Senegal in and around March 1, 2009 to meet with Vale representatives  ii. between March 19, 2009 and March 25, 2009 for meetings attended by Vale, Steinmetz, Moussa Dadis Camara, and Mahmoud Thiam;  iii. to Paris in and around April 2009 to meet with representatives for Vale and Mahmoud Thiam; iv. to Brazil in January 2010 to meet with representatives for Vale.	(DKR OR Paris OR CDG OR France OR Brazil OR Rio OR GIG OR GRU) <u>AND</u> (Meet* OR met* OR appoint*)  Date period: 1/1/2009 – 28/2/2010  (Vale OR Steinmetz OR Ben*OR Moussa OR Dadis OR Camara OR Mahmoud OR Thiam OR BSG*) <u>AND</u> (met* OR appoint* OR call* OR discuss*)  Date period: 1/1/2009 – 28/2/2010  (DKR OR Paris OR CDG OR France OR Brazil OR Rio OR GIG OR GRU) AND (Vale OR Steinmetz OR Ben*OR Moussa OR Dadis OR Camara OR Mahmoud OR Thiam OR BSG)  Date period: 1/1/2009 – 28/2/2010	Navigant search terms: Dakar OR Sengal Date period: 1/1/2009 – 31/3/2009  Navigant search terms: Vale AND meet* Date period: 1/1/2009 – 30/4/2009  Navigant search terms: Vale AND meet* Date period: 1/1/2010 – 28/2/2010	0 / 2 / 0 / 2  2/10/0/1  15/3/6/1

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
23.	(m)	email, letters, & other docs & communications held on by BSGR (electronic system or other locations) exchanged between Roy Oron, Marc Struik, Asher Avidan, and/or Frederic Cilins and Ibrahima Touré relating to Simandou or Guinea between January 1, 2005 through December 31, 2006	(Roy OR Marc OR Asher) <b>AND</b> (Frédéric OR Fred*OR Frederic OR Ibrahima OR Touré)	Navigant search terms: (Oron OR Stuik OR Avidan) AND (Cilins OR Toure) Date period: 1/1/2005 – 21/12/2006	0 / 0 / 6 / 0
24.	(n)(i)	BSGR Communications with GOG	BSGR E-mail Domain <b>AND</b> GOG E-mail Domain[s]	No search terms needed	
25.	(n)(ii)	BSGR Communications with SFO		No search terms needed	
26.	(n)(iii)	BSGR Communications with US DOJ		No search terms needed	
27.	(n)(iv)	BSGR Communications with French public authorities		No search terms needed	
28.	(n)(v)	BSGR Communications with Swiss public authorities		No search terms needed	
29.	(o)	Pentler documents i. Memorandum of Association, ii. Register of Members, iii. Register of Mortgages and Charges, iv. Incorporation Certificate, v. Articles of Association, vi. Register of Directors, vii. The Minutes and Resolutions including the First Minutes and Resolutions, viii. Pentler's certificate of authorized capital stamped by Margali Management, ix. The Letter from BSGR to Pentler		No search terms needed	

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
		dated 13 February 2006 attesting that Onyx holds 88250 shares in BSG Resources Guinea equivalent to 17.65% on behalf of Pentler Holdings, subject to the execution of the contract between BSG Resources (Guinea) Limited and the GoG regarding the mining exploration of iron ore and bauxite in Guinea, x. The Power of Attorney dated 13 February 2006 authorizing Avraham Lev Ran to act on behalf of Pentler Holdings Ltd signed by Sandra Merloni-Horemans.			
30.	(p)	SFO file of correspondence provided to Court		No search terms needed	
31.	(q)	Emails, letters and other documents and communications on the BSGR IT system or in other locations within possession custody or power of BSGR, between BSGR Representatives regarding BSGR's representations and warranties in the Framework and Shareholders Agreements entered into with Vale, from July 1, 2009 until April 30, 2010.	VALE <b>AND</b> (rep* OR warrant*) <b>AND</b> (framework OR shareholder*)	Navigant search terms: (representations OR warranties) AND (framework OR agreement OR shareholder) AND Vale Date period: 01/07/2009 – 30/04/2010  Separate collection of electronic data room (Vale due diligence)	222 / 50 / 22 / 16
32.	(r)	Cilins i. Cilins' activities in Guinea on BSGR's behalf relating to	(Frédéric OR Fred* OR FC) <b>AND</b> (Mamadie OR Touré OR Toure OR Jacksonville OR JAX OR New York OR	Navigant search terms: Cilins Date period: 01/01/2004 – 30/04/2013	226 / 441 / 224 / 31

Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
	<p>Simandou;</p> <p>ii. Cilins' interactions with Mamadie Touré in Jacksonville, Florida and New York;</p> <p>iii. Agreements between Cilins and BSGR relating to Guinea, Simandou, Mamadie Touré, or payments to Representatives of the Government of Guinea, or payments to Cilins' or Cooley LLP relating to Cilins' representation in his criminal case;</p> <p>iv. Payments from BSGR to Cilins relating to Guinea, Simandou, Mamadie Touré, payments to Representatives of the Government of Guinea, or payments to Cilins' or Cooley LLP relating to Cilins' representation in his criminal case;</p> <p>v. Cilins' contacts with Roy Oron, Ibrahima Touré, Mamadie Touré, Mahmoud Thiam, Moussa Dadis Camara, Lansana Conté, Kassory Fofana, Pentler Holdings, or Matinda and Co. Limited;</p> <p>vi. Cilins' offer to pay Mamadie Touré \$12 million, which was to be distributed to President Lansana Conté or other Guinean ministers or officials</p> <p>vii. Cilins' attempt to destroy</p>	<p>NYC OR JFK OR BSG* OR Guinea* OR Simandou OR "Project hill* OR "Trojan Horse" OR Cooley OR Block*OR DOJ OR Justice OR FBI OR Lasana OR Conte OR President OR Conde OR Condé OR destroy* OR million OR Oron OR Irahima OR Mahmoud OR Thiam OR Moussa OR Dadis OR Camara OR Kassory OR Fofana OR Pentler OR Matinda)</p> <p>"Cooley LLP" should also become "Cooley"</p>	<p>Navigant search terms: "Cooley LLP"</p> <p>Additional consultation with accountants for payment evidence.</p>	0 / 0 / 0

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
		documents of Mamadie Touré			
33.	(s)	Documents supporting BSGR's allegations that rumors of wrong doing by BSGR and / or Steinmetz were the result of a "misinformation campaign by Rio Tinto		<p>Navigant search terms: (misinformation OR campaign OR blackbird) AND "Rio Tinto"</p> <p>Navigant search terms: "Dav* Smith" AND Rio</p>	643 / 846 / 3825 / 219 50 / 15 / 3210 / 3
34.	(t)	Blackmail attempts	extort* OR "black mail"	<p>Navigant search terms: blackmail OR extortion OR brib* or forger*</p> <p>Date period: 01/02/2010 – 31/03/2010</p> <p>Navigant search terms: camara</p> <p>Date period: 01/02/2010 – 31/03/2010</p> <p>Navigant search terms: Gassama</p> <p>Date period: 01/05/2010 – 31/05/2010</p> <p>Navigant search terms: "groupe founta mondial"</p> <p>Date period: 01/06/2010 – 30/06/2010</p> <p>Navigant search terms: Matinda</p> <p>Date period: 01/06/2010 – 30/06/2010</p>	666 / 525 / 566 / 119 8 / 14 / 0 / 1 0 / 0 / 0 / 0 0 / 0 / 0 / 0 0 / 0 / 0 / 0
35.	(u)	Docs supporting BSGR's allegations that third parties colluded with GoG to strip it of the Simandou concession, including but not limited to its allegations that South African third parties were involved in election rigging.		No search terms needed	
36.	(v) (x)	(v) The emails, letters and other documents between BSGR and Vale reps re potential JVP for in Simandou Blocks 1 and 2, between	(BSG* and Vale) <u>AND</u> (Simandou OR "project hill**" OR "trojan horse" OR block*)	<p>Separate collection of electronic data room (Vale due diligence)</p> <p>Searches of all correspondence between (BSGR or</p>	583 / 28 / 20 / 0

Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
	<p>January 1, 2008 and April 30, 2010.</p> <p>(x) Documents referring to information and documents related to Simandou and received by BSGR from Vale before April 2010;</p>		<p>Onyx) and Vale email addresses.</p> <p>Date period: 1/1/2008 – 30/4/2010</p> <p>includes:</p> <p><b>BSGR emails:</b></p> <p>alain.sultan@bsgresources.gg;    amit@bsgresources.com; ariel@bsgresources.com;    compose\?to=asher@bsgresources.com;    asher.avidan@bsgresources.gg;    asher@bsgrsources.com; asher@bsgresources.com;    bsgr@internal_domain; bsgr@fd.com;    bsgre@internal_domain; bsgre@powerscourt-group.com; bsgrmediadistribution@powerscourt-group.com; craig@bsgresources.com;    dag@bsgresouces.com; dag@bsgms.com;    daniel.bsgr@internal_domain;    daniel.pollak@bsgresources.gg;    daniel@bsgresources.com;    daniel.pollak@bsgresources.com;    daniel.taback@bsgresources.com;    daniel.taback@bsgresources.gg; /o=bsg/ou=first administrative group/cn=recipients/cn=daniel;    david@bsgms.com; david.clark@bsgresources.gg;    david.stinfeld@bsgresources.gg;    david.stinfeld@bsgresources.com;    david.clark@bsgresources.com;    davidclark@bsgresources.gg;    davidg@bsgresources.com;    dudy@bsgresources.com; emil@bsgresources.com;    emil.attias@bsgresources.gg;    eyal.hahn@bsgresources.gg;    frank.eagar@bsgresources.com;    frank.eager@bsgresources.gg;    frank.eagar@bsgresources.gg;    frank@bsgresources.com;</p>	

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			garneth.shamaila@bsgresources.gg; garneth@bsgresources.com; gemma.mason@bsgresources.gg; gerry@bsgresources.com; graham.wark@bsgresources.gg; graham@bsgresources.com; guy.talmor@bsgresources.gg; guy@bsgresources.com; hagai@bsgresources.com; helen.nicolle@bsgresources.gg; helen@bsgresources.gg; info@bsgresources.gg; ist@bsgresources.com; iwan.williams@bsgresources.cgg; iwan.williams@bsgresources.gg; iwan@bsgresources.com; jez.mercer@bsgresources.gg; johana@bsgresources.com; kronge@octeagroup.com; kotler.roi@bsgresources.com; lara@bsgresources.com; liz.powers@bsgresources.gg; malcolm.barnes@bsgresources.gg; marc.bsgr@internal_domain; marc@bsgresources.gg; marc.struik@bsgresources.gg; marc@bsgresources.com; marc@bsgresources.com; mike.kritzinger@bsgresources.com; mike@bsgresources.com; bah@bsgresources.com; neil.gray@bsgresources.com; neil@bsgresources.com; neil.gray@bsgresources.gg; nicola@bsgresources.com; oren.koreh@bsgresources.com; parick@bsgresources.com; patarick@bsgresources.com; patrick.saada@bsgresources.gg; /o=bsg/ou=first administrative group/cn=recipients/cn=patrick;	

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			<p>patrick@bsgresources.com;  patrick@bsgresources.com;  peter@bsgresources.com;  postmaster@bsgresources.gg;  richard.belcher@bsgresources.com;  roger.williams@bsgresources.gg;  sarah.bryce@bsgrersources.gg;  sarah.bryce@bsgresources.gg;  sarah@bsgresources.com; sarah@bsgresources.gg;  stephen.oke@bsgresources.gg;  steven.oke@bsgresources.gg;  tania.rakitina@bsgresources.gg;  tania@bsgresources.com;  theresa@bsgresources.com;  tijana.djurovic@bsgresources.gg;  tom@bsgresources.com; yossie@bsgresources.com;  yossie.tchelet@bsgresources.gg;  yossie@bsgresolurces.com; yossie@bsgresources.gg;  yuval@bsgresources.com; zoe@bsgresources.gg</p> <p><b>Vale emails</b></p> <p>aboubacar.camara@vale.com;  alex.monteiro@vale.com; bruno.abreu@vale.co.za;  bruno.abreu@vale.com; carla.albano@vale.com;  carlos.esteves@vale.com; c0210385@vale.com;  carrick@4c-burvale.co.uk; cedric.lemarie@vale.com;  charles.rezende@vale.com;  daniela.chimissodossantos@valeinco.com;  cinthya.catalao@vale.com;  claudia.monteiro@vale.com;  claudia.cordeiro@vale.com;  claudio.depес.tallon@vale.com;  clovis.torres@vale.com; corbett@4c-burvale.co.uk;  cynthia.catalao@vale.com;</p>	

Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
			daniela_chimisso_dos_santos@vale.com; corporate.inco@vale.com; daniela.chimisso@vale.com; daniela.chimissodossantos@vale.com; djamila.osman@vale.com; edson.ribeiro@vale.com; eduardo.etchart@vale.co.za; eduardo.ledsham@vale.com; fabio.duarte@vale.com; fabio.masotti@valeaustralia.com.au; fernanda.britto@vale.com; fernanda.ribeiro.costa@vale.com; fritz.fiethen@vale.co.za; galib.chaim@vale.com; gestao.divida@vale.com; guilherme.cavalcanti@vale.com; gustavo.selayzim@vale.com; gustavo.raposo@vale.com; halimatou.diallo@vale.com.gn; ivo.brasil@vale.com; james.nwankwo@vale.com; jean.louis.geyr@vale.com; joao.mendes@vale.com; singapore.valeglobal@vale.com; jose.andre.alves@vale.com; jose.c.martins@vale.com; jose.delamanha@vale.com; karin.kern@vale.com; karla.melo@vale.com; kiara.machado@vale.com; imceaex- _o=valeorg_ou=exchange+20administrative+20group+20+28fydibohf23spdlt+29_cn=recipients_cn=larissa+2egomes@vale.com; larissa.lima@vale.com; leandro.teles@vale.com; leticia.zuardi@vale.com; luciana.ferreira@vale.com; lucio.cavalli@vale.com; luiz.confucio@vale.com; marcello.quintella@vale.com; marcelo.habibe@vale.com; marcelo.terra@vale.com; marcio.godoy@vale.com; marcio.senne@vale.com;	

Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
			<p>marco.barcellos@vale.com;  marcos.santos.cesar@vale.com;  maria.isabel.vieira@vale.com;  mauricio.pereira@vale.com;  mmoolman@kervale.com.au;  murillo.ferreira@vale.com;  murilo.ferreira@vale.com; paul.escoute@vale.com;  paulo.bergman@vale.com;  paulo.henrique.soares@vale.com;  pedro.pimentel@vale.com;  pedro.rodrigues@vale.com;  peter.brady@valeinco.com; rafael.benke@vale.com;  renata.ribeiro@vale.com; ricardo.saad@vale.com;  ricardo.gotelip@vale.com;  roberta.oliveira@vale.com;  roberto.castello.branco@vale.com;  rodrigo.almeida@vale.com; rodrigo.paiva@vale.com;  roger.agnelli@vale.com;  rogerio.teixeira.santos@vale.com;  ruben.fernandes@vale.com; silvia.zagury@vale.com;  sonia.zagury@vale.com; stephen.potter@vale.com;  tatiana.tauhata@vale.com;  telesphore.tchatchou@vale.com;  thiago.fontaine@vale.com;  valentine.mushayakarara@internal_domain;  victor.martinez@vale.co.za; wanda.alves@vale.com;  <a href="mailto:yara.schwertner@vale.com">yara.schwertner@vale.com</a></p> <p><b>Onyx emails:</b>  administrator@onyxfa.com; adviser@onyxfa.com;  advisor2@onyxfa.com; advisor@onyxfa.com;  alexandra@onyx-suisse.com; alison@onyxfa.com;  ama@onyxfa.com; ami@onyxfa.com;  anna@onyxfa.com; anna@onyx.fa.com; anne@onyx-</p>	

Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
			<p>suisse.com; anton@onyxfa.com; asher@onyxfa.com; beny@onyx-suisse.com; beny@onyxfa.com; beny@onyx-swisse.com; chantal@onyxfa.com; chris@onyxfacom; chris@onyxfa.com; chris.p@onyxfa.com; chris.constantinou@onyxfa.com; chris.p@onyxfa.con; dag@onyxfa.com; dag@onyxsa.com; david.bonnett@onyxfa.com; david.g@onyxfa.com; david@onyxfa.fom; david@onyxfa.com; davidb@onyxfa.com; dcramer@onyx-suisse.com; doron@onyxfa.com; elaine@onyxfa.com; elida@onyxfa.com; fabricio@onyxfa.com; graham@onyxfa.com; gregg@noviagaming.com; gregg@onyxfa.com; hagit@onyxfa.com; jin@onyxfa.com; katied@serpentinegallery.org; kevin@onyx-suisse.com; kobi@onyxfa.com; lewis@onyxfa.com; londonoffice@onyxfa.com; marc@onyxfa.com; martin@onyxfa.com; michaelbaynes@yahoo.com; microsoftexchange329e71ec88ae4615bbc36ab6ce41109e@onyx-suisse.com; naciye@onyxfa.com; natacha@onyx-suisse.com; nic@onyxfa.com; nicola@onyxfa.com; ola@onyxfa.com; onyx@troublefree-it.co.uk; teamonyx@onyx-suisse.com; onyx.geneva.users@internal_domain; info@onyxfa.com; paul@onyx-suisse.com; peter@onyx; peter@onyx-suisse.com; poonam@onyxfa.com; postmaster@onyx-suisse.com; raj@onyxfa.com; /o=onyx/ou=domain/cn=recipients/cn=ronitl; sandra@onyx-swisse.com; sandra.merloni@onyx-suisse.com; sandra@onyx-suisse.com; serena@onyx-suisse.com; stephanie@onyx-suisse.com; theresa@onyxfa.com; reception@onyxfa.com;</p>	

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
				vaida@onyxfa.com; vaida.kasperaviciute@onyxfa.com; vida@onyxfa.com; dag@onyxfa.com8; david@onyxfa.com@mms.cellcom.co.il	
37.	(w)(i)-(iii) & (v)	<p>Data obtained from Vale</p> <p>i. BSGR's alleged use of data obtained from Vale concerning the development of mining targets and drill locations at Simandou mining sites Metallica, Iron Maiden, the Gaff, Massif de Diodio, Damaro, Samedougou, and Steely Dan;</p> <p>ii. BSGR's alleged use of data obtained from Vale concerning the identification and selection of a port or ports in Liberia for exporting iron ore from Simandou Blocks 1 and 2, as referenced in BSGR, VBG, and Vale's September 2011 Simandou Feasibility Study;</p> <p>iii. BSGR's alleged use of data obtained from Vale concerning the transport of iron ore from Simandou via a Trans-Guinea railway or alternatively rebuilding the Trans-Guinea railway for passenger and light commercial use, as announced in BSGR's 30 April 2010 press release on the Vale-BSGR Simandou joint venture;</p> <p>v. BSGR's alleged use of data obtained from Vale concerning Rio</p>	<p>(BSG*) AND ((port* OR rail*) /s Liberia)</p> <p>"Simandou Feasibility Study" <u>AND</u> (Vale OR BSG*)</p> <p>(BSG*) <u>AND</u> ("trans-guinea" OR rail*)</p> <p>(BSG*) <u>AND</u> ("captain hook" OR damaro OR kerkour OR ballagb* OR Diodio OR "pic de tibe")</p>	<p>Navigant search terms: vale AND (Metallica OR "Iron Maiden" OR gaff OR "Massif de Diodio" OR Damaro OR Samedougou OR "Steely Dan" OR "Captain Hook" OR "Kerkour South" OR Ballagbeni OR "Pic de Tibe")</p> <p>Navigant search terms: Vale AND (port or rail*) AND Liberia</p> <p>Navigant search terms: Vale AND Trans-Guinea</p>	138 / 2786 / 212 / 295  1948 / 4481 / 1577 / 633  280 / 373 / 176 / 123

	Schd A	Request detail	QE Suggested Search Terms	Details regarding searches conducted	Hit report (ran over 4 jurisdictions)
		Tinto's mining targets and drill locations at Simandou mining sites Captain Hook, Damaro, Kerkour South, Ballagbeni, Diodio, or Pic de Tibe.			
38.	(w)(iv)	BSGR's communications with the Government of Liberia and/or the Government of Guinea, before April 30, 2010, regarding a Liberian rail line and port in Liberia for exporting iron ore from Simandou	Liberia* <b>AND</b> (port OR rail*)	Navigant search terms: Liberia AND (port OR rail) Date period: 01/02/2006 – 30/4/2010	546 / 317 / 53 / 401
39.	(y)	All docs which concern or were used to develop the January 21, 2009 “BSGR Guinea Simandou Blocks 1 and 2 Exploration Programme and Budget,” created by Graham Greenway, Iwan Williams, and Iain Bryson.		Navigant search terms: budget AND (guinea OR simandou) AND (Graham OR Greenway OR Iwan OR Williams OR Iain OR Bryson) Date period: 1/1/2008 – 1/2/2009  Navigant search terms: “Exploration Programme and Budget”	0 / 88 / 2 / 5  0 / 5 / 2 / 2